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March 16, 2012

Ms. Jill Sugarman Reports Analysis Division Federal Election Commission 999 E Street, NW Washington, DC 20463

**IDENTIFICATION NUMBER: C00431171** 

REFERENCE: YEAR-END REPORT (10/01/2011-12/31/2011)

Dear Ms. Sugarman,

This statement is in response to the Commission's letter dated March 1, 2012. The Commission requested additional information on seven items.

First, the Commission requested clarification on contributions that appear to exceed federal limits. The individuals that appear to exceed the contribution limits do not. Any amount over the contribution limit of \$2,500 has been refunded or reattributed within the 60 days. These refunds are either reflected in the February Monthly, or will be reflected in the March Monthly.

Second, the Commission requested clarification on one contribution that appeared to be from an LLC that was taxed as a corporation. That contribution was refunded as soon as the Committee discovered it was taxed as a corporation in accordance with FEC regulations.

Third, the Commission requested clarification on donors who had mailing addresses outside the United States. Our Committee has safeguards in place to ensure that all contributions are made by eligible donors only.

Fourth, with respect to the non-federal committees listed, our Committee has safeguards in place to ensure that these committees used permissible funds for the contributions.

Fifth, our disbursement to "Petty Cash" comports with the standards outlined in the Commission's letter.

Sixth, the Committee has reviewed all reimbursements to individuals for travel and subsistence and confirms that no further itemization is required under any Commission regulations for these expenditures.

Seventh, the Commission requested further clarification on several voided or returned checks. These checks were voided either because services were never rendered or they represent duplicate charges.

This should answer the Commission's inquiry.

Sincerely,

Darrell Crate Treasurer

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